



March 20, 2012

Dr. Robert Petzel
VA Undersecretary for Health
VA Building
Room 800
810 Vermont Avenue, N.W.
Washington, DC 20420

Subject: Mental Health Counselors and Marriage and Family Therapists

Dear Dr. Petzel:

This letter is concerning recognition of mental health counselors (MHCs) and marriage and family therapists (MFTs) by the United States Department of Veterans Affairs (VA). Our coalition of organizations—the National Board for Certified Counselors, American Counseling Association, American Mental Health Counselors Association, American Association for Marriage and Family Therapy, and California Association of Marriage and Family Therapists—represents over 170,000 licensed MHCs and MFTs throughout the United States.

As you know, in December 2006, legislation was signed into law by President Bush adding licensed MHCs and MFTs to the list of eligible VA mental health professions. It was not until September 2010, however, that qualification standards were adopted to allow for the hiring of these professionals. Since that date, our coalition has worked with VA staff and our licensed MHCs and MFTs to facilitate the hiring process.

Unfortunately, the pace and breadth of hiring have been disappointing, and afflicted with numerous problems. Since release of the qualification standards, the typical number of VA positions listed through the U.S. Office of Personnel Management's USAJobs Web site for Licensed Professional Mental Health Counselors (LPMHCs, the VA title) and licensed MFTs has been from two to four. During this same period, 100 or more openings have regularly been posted for social workers. Further, the licensed MFT positions are predominantly in vet centers, and while VAMC jobs are available to both professions, there's been little hiring of either in the medical facilities.

Our coalition has made every effort to work with VA to address the challenges that we have encountered. While VAMC staff have been responsive, we have been totally shut out by the VA Readjustment Counseling Service (RCS). RCS senior staff members have not only failed to meet with our coalition, but have not even provided us the courtesy of a response. RCS's chief officer has been contacted via e-mail and phone nine times over the last 10 months by representatives from three different organizations, and not once has he or his office acknowledged receipt. At a time when RCS is seeking to fill many mental health staffing vacancies in vet centers, it is surprising that RCS would not take the opportunity to meet with

organizations that represent over 170,000 practitioners. The lack of responsiveness suggests that veterans' mental health is not a priority for RCS.

Moreover, there are substantive issues with the manner in which RCS is using LPMHCs and licensed MFTs. The RCS policy to place at least one family therapist in every vet center has prompted hiring, but there have been few job opportunities for licensed MFTs or LPMHCs. In fact, it appears that RCS is encouraging social workers to take supplemental training in family therapy so that they can be hired to fill positions advertised under the MFT title. Meanwhile, virtually no LPMHC positions have been available with RCS. It is illogical for VA to be filling family therapist jobs with social workers when there are many interested MFTs and LPMHCs with family therapy training.

Additionally, RCS shows significant favor to social workers through its job postings. RCS has posted numerous openings for Readjustment Counseling Therapist (RCT) positions that are available to all mental health professions—social workers, licensed MFTs and LPMHCs. At the same time, RCS facilities are cross-posting these same positions for social workers. The positions have the same responsibilities, so there is no reason to post them separately for social workers. The problem is compounded by the fact that the majority of RCT positions are only available to current federal employees, while the corresponding social worker postings are open to the public. The result of this distinction is that nearly all new employees will be social workers. If there are valid reasons to dually post the position, why not also cross-post for LPMHCs and licensed MFTs?

Finally, RCS has not created a professional standards board (PSB) for either LPMHCs or licensed MFTs. The failure to create a separate board reinforces the perception that RCS is not interested in hiring LPMHCs or licensed MFTs or providing the same treatment as other professions.

While RCS has been nonresponsive, VAMC staff have been accessible and professional. Members of our coalition have met individually and in groups with many VAMC staff and appreciate the open discussions. However, many problems remain at the VAMC, particularly the slow pace of hiring.

The VAMC adopted qualification standards for LPMHCs and licensed MFTs in September 2010, allowing for the hiring of these professionals. The VAMC leadership has disseminated the new standards and reminded facilities and staff about the new policy. These efforts have resulted in modest employment opportunities, but failed to produce significant change. Our organizations continue to receive reports from counselors and MFTs who want to work within the VA, but cannot find a position open to their profession. More disturbingly, we receive reports from individuals who have been directly told that their facility cannot, or will not, hire LPMHCs or licensed MFTs. These responses demonstrate widespread misunderstanding about the new policy at best, and institutional resistance at worst. The overall hiring numbers suggest that these reports are more than outliers.

The issues are systemic and require a national solution. The VA reminds us that hiring decisions are left to local facilities, but the national VA has the authority to promote the hiring of these professions and the ability to develop creative methods to make this happen. For instance, the VA Office of Academic Affiliations manages a Trainee Support Program that provides funding to social workers and psychologists who work in VA facilities. The Office of Academic Affiliations has told our coalition that LPMHCs and licensed MFTs are not eligible to compete for this funding. It makes no sense that a national program designed to encourage mental health professionals to work for the VA excludes these two disciplines. This is contrary to what the VA should be doing to promote the hiring of LPMHCs and licensed MFTs.

Moreover, the VA could take proactive steps to promote employment. One step would be to create a new liaison position for LPMHCs and licensed MFTs to facilitate education and collaboration, as was done for occupational therapists. VA may also wish to implement policies that encourage facilities to hire a more diverse range of professionals. One example would be a policy requiring that a facility cross-post for LPMHCs and licensed MFTs when a social work position is vacant for longer than two weeks. While we recommend these steps to jumpstart the process, we look forward to additional ideas from VA.

VA is confronted with the growing behavioral health needs of the veteran population as troops return from the Middle East. Mental health staff vacancies exacerbate the problem and threaten the health care safety net. VA has the opportunity to address these challenges by employing mental health counselors and marriage and family therapists. To capitalize, VA needs to increase the priority of hiring these professions and establish national policies and procedures to make it happen. As it now stands, VA departments and facilities work in isolation, failing to consider innovative systemic solutions to this problem. We urge VA to change course and partner with our coalition to ensure all veterans have access to qualified mental health professionals.

We appreciate your attention to this matter and consideration of our recommendations. We would welcome the opportunity to meet with you to discuss these issues and develop a process for collaboration. If you would like more information or to schedule a meeting, please contact David Bergman at 703-739-6208 or bergman@nbcc.org. Thank you for your leadership and dedication to the health of our nation's veterans.

Sincerely,

National Board for Certified Counselors
 American Counseling Association
 American Mental Health Counselors Association
 American Association for Marriage and Family Therapy
 California Association of Marriage and Family Therapists

